

CONSULTATION RESPONSE

R0266 REC DATA SPECIFICATION CLARIFICATIONS

DATE ISSUED	23 January 2026
RESPONSE DEADLINE	27 February 2026

LINKS

- [Change Proposal Page](#)
- [Consultation Register](#)

The completed response document should be uploaded to the REC Portal. On the Consultation Page click 'Add Response' to upload the completed document. Further information about Consultations can be found in the [Change Management User Guide](#).

Responses can be submitted as:

- **Non-confidential** – the full response plus the submitting organisations name and category will be published; or
- **Confidential** – responses will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders. Details of the response will not be referenced in any Change Report; or
- **Anonymous** – the full response will be published, but will omit the name of the submitting organisation (organisation category will be published). Details of the response will be referenced in the Change Report, and the organisation name will be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant).

Organisations can submit the whole response as non-confidential, confidential or anonymous, or flag each question separately as they wish.

All responses will be treated as non-confidential unless indicated otherwise.

The Code Manager recommends that only financials or other commercially sensitive information is submitted confidentially, and that anonymous is used for all other cases where the submitting organisation does not wish to be identified, as this allows the details of the response to be seen in the Change Report and for the Code Manager's comments to the response to be published.

1 RESPONDENT DETAILS

NAME	David Addison
ORGANISATION	Xoserve
ORGANISATION CATEGORY	Other (CDSP)
EMAIL ADDRESS	David.Addison@Xoserve.com
TELEPHONE NUMBER	
RESPONSE CONFIDENTIALITY	Non-Confidential

2 QUESTIONS

1. Do you agree with the proposed solution? If not, please explain why?	
In principle we support the proposed solution.	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
Yes	
RESPONSE CONFIDENTIALITY	Non-Confidential

3. Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
There is anticipated to be no costs associated with this change. The change seeking to reinstate Code that was omitted as part of the transition to REC. On this basis the processes are not anticipated to be impacted but REC Schedules updated to capture in more detail.	
RESPONSE CONFIDENTIALITY	Non-Confidential

4. Do you agree with the Code Manager’s assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel?

We agree that the change should not be subject to authority consent.

RESPONSE CONFIDENTIALITY

Non-Confidential

5. Do you agree with the Code Manager’s recommendation that this Change Proposal should be approved for implementation on 06 November 2026? If not, please explain why?

We have raised some observations regarding the change solution. If these changes are agreed, we have no objections to the change being implemented in November.

RESPONSE CONFIDENTIALITY

Non-Confidential

6. Do you have any other comments relating to this Change Proposal?

Further clarity on the Address Population Rules as it is unclear as to which flows this document is intended to apply. The term ‘Metering Point Address’ is not a defined REC term, but it is assumed that it is the Address of the Metering Point. The Metering Point is a defined term in the REC that we assume is exclusively related to a meaning given to it in the Electricity Distribution Licence, it appears this may not be appropriate for use in a gas context.

Given the references to SAF and Unmetered Supplies, our understanding is that this Schedule may not be intended to apply to Gas. It may be more effective for the intended guidance to be incorporated within the relevant Operational Guidance for the applicable flows.

As part of the review, we have noted that paragraph 2.17 includes a reference to paragraph 19.8 but it is assumed that this was a migration issue from the previous drafting [in the MRA].

Some of the data item rule changes defined for the ONJOB may not be correct and may require review as outlined below:

- Market Sector Code – CDSP T73 request can only be used for non-CSS sites. Suppliers should update the market indicator via CSS.
- The REC Defined Term is Converter, please could you arrange to amend references to ‘convertor’
- Register Type Code – the notes may be misleading as both converted and unconverted registers would be provided for a converter. Assume contextually this is correct regarding

where this appears within the flow relating to an instance that an asset is being reported against (but would not be true of the message in the instance of a converter exchange where we would expect to get both registers for the removed and installed converter).

- Register Type Code - These could be provided for any measuring assets present at the event being reported – does any conditionality related to this need to be included as well as ‘mandatory for installed assets only’. NB: there is a further level of complexity that is not contemplated in the document related to the Data Update Code.
- Register Type Code – The notes might need to be refined as would need additional contextual layer to describe that Assets can be provided in the context of installed / removed / reported. But in the case of an exchange there would be an install instance AND a removal instance. Appreciate that at the point that Register Type Code is specified additional context will have been provided in the preceding datasets.
- Meter Link Code – the CDSP does not allow updates to this data item via these flows whereas the notes infer that these may be allowed.
- Reading Data Set (007) – this is expected to be mandatory for installed, removed and reported measuring assets.
- Serial Number – for Removed Asset this would be mandatory for any flows to the CDSP and equally would expect that this would define any downstream flows so statement should be ‘Mandatory for installed and removed Asset’.
- Notes that state that the flows to CDSP (SV40015; SV40018; SV40021) this can only be fulfilled if all flows contain this data, therefore should be provided by MAMs to Suppliers to Shippers.
- ‘Units of Measure’ – Must be provided for a Converter Asset, but in the event that the Units of Measure of the installed Meter and Converter are not aligned, the Units of Measure will be derived based upon the Meter Asset’ asset.
- 027 Name – it is unclear whether the two statements related to the MAP and Requestor are linked I would assume not and as a result would suggest that these are recorded as separate points.
- 028 Address. We would suggest that the address guidance provided in the Address Population Notes is added here.
- 028 Address. The notes state: “Please reference Address Population Rules.” Is this the existing text in the notes, or should this be marked as a change?

NOTE: observations that I have made on the document not being changed by this document:

- Flows SV40015; 18 and 21 are not RECCo flows, these are governed by Xoserve as the CDSP under the UKLM in the UNC.
- 022 Meter dataset – text at group level ‘if Meter at Metering Point’ might infer that this would be mandated for any reported or removed assets – and this would not be correct.
- 005 – Converter. As above.

No changes to the UKLink file formats used by Shippers to update asset data are anticipated to be carried out by the CDSP as a result of this change.

We have reviewed this document reflecting that these flows have many contexts in which they could be sent and received, therefore we don't expect that any of our comments are intended to change existing functionality nor can we say that they are exhaustive for each context that could

occur. Annex B was designed to provide greater contextual insights to the originators of the flows, so we would suggest that we promote the visibility of this document and a review by originators and recipients of these flows. We acknowledge that this is a large piece of work and beyond the scope of R0266 and look forward to working with the Code Manager in the future to undertake this activity.

RESPONSE CONFIDENTIALITY

Non-Confidential